

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

SRINIVASA RAO KAMBALA, <i>et al.</i>	§	
	§	
Plaintiffs.	§	
v.	§	Case No. 1:13-cv-00498-RC-ZJH
	§	
SIGNAL INTERNATIONAL LLC, <i>et al.</i>	§	
	§	
Defendants.	§	

**PLAINTIFFS' RESPONSE TO BURNETT'S MOTION TO REASSERT MOTIONS TO
DISMISS (DOC NO. 33) AND MOTION TO DISMISS FOR LACK OF JURISDICTION
(DOC NO. 32)**

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(admitted by *pro hac vice*)

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Defendants Malvern C. Burnett, The Law Offices of Malvern C. Burnett, A.P.C., and Gulf Coast Immigration Law Center, L.L.C. (collectively, “Burnett”) have moved to reassert motions to dismiss pursuant to Fed. R. Civ. 12(b)(2) and Fed. R. Civ. P. 12(b)(6) (Motion to Reassert, ECF No. 43). The Plaintiffs filed Plaintiffs’ Second Amended Complaint on April 11, 2014 (ECF No. 39). Burnett moved to reassert these motions following this Court’s Order, dated April 25, 2014 (ECF No. 41), denying as moot Burnett’s “Motion to Dismiss” (ECF No. 33), and Burnett’s “Motion to Dismiss for Lack of Jurisdiction” (ECF No. 32).

As Burnett has offered no new allegations or arguments in support of these Motions to Dismiss, Plaintiffs hereby respectfully reassert all Responses in Opposition to Burnett’s reasserted Motions to Dismiss. Specifically, Plaintiffs wholly adopt and reassert: (1) Plaintiffs’ Response in Opposition to Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(2) of Burnett Defendants (ECF No. 36); (2) Plaintiffs’ Response in Opposition to Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6) of Burnett Defendants (ECF No. 37).

For the reasons outlined in Plaintiffs’ reasserted Responses in Opposition, Plaintiffs respectfully request that Burnett’s reasserted Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6) be denied in their entirety.

Respectfully submitted this 13th day of mAY, 2014.

EQUAL JUSTICE CENTER

By: /s/ Christopher J. Willett
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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2014, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which sent notification of an electronic filing to all CM/ECF participants.

/s/ Christopher J. Willett

Christopher J. Willett